UNITED	STA	TES I	ISTRI	CT C	OURT
SOUTHER	EN DI	STRI	CT OF	'NEV	YORK

	All was the f
١	USDC SDNY
	DOCUMENT
	ELECTRONICALLY FILED
,	DOC #:
`	DATE FILED: <u>7/4///</u>
- 1	1

IN RE MUNICIPAL DERIVATIVES ANTITRUST LITIGATION

MDL No. 1950

Master Docket No. 08-2516(VM)(GMG)

ECF Case

STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO
COMPLAINT

THIS DOCUMENT RELATES TO:

Utah Housing Corporation v. CDR Financial Products, Inc., et al., No. 11-cv-1019 Active Retirement Community, Inc. d/b/a Jefferson's Ferry v. Bank of America, N.A., et al., No. 1:10-cv-08273 Los Angeles Unified School District v. Bank of America, N.A. et al., No. 1:11-cv-00361 Kendal on Hudson, Inc. v. Bank of America, N.A., et al., No. 1:10-cv-09496 Peconic Landing at Southhold, Inc. v Bank of America, N.A., et al., No. 1:11-cv-00682 City of Los Angeles v. Bank of America, N.A., et al., No. 08-10351 City of Riverside, et al. v. Bank of America, N.A., et al., No. 09-10102 City of Stockton v. Bank of America, N.A., et al., No. 08-10350 Contra Costa County v. Bank of America, N.A., et al., No. 09-1197 County of San Diego v. Bank of America, N.A., et al., No. 09-1195 County of San Mateo v. Bank of America, N.A., et al., No. 09-1196 County of Tulare v. Bank of America, N.A., et al., No. 10-0628

Los Angeles World Airports v. Bank of America, N.A., et al., No. 10-0627 The Redevelopment Agency of the City of

al., No. 10-0630

et al., No. 10-4988

al., No. 10-4989

Stockton, et al. v. Bank of America, N.A., et

Sacramento Municipal Utility District v. Bank of America, N.A., et al., No. 09-10103 Sacramento Suburban Water District v. Bank of America, N.A., et al., No. 10-0629 East Bay Municipal Utility District v. Bank of America, N.A., et al., No. 10-4990 City of Redwood City v. Bank of America, N.A.,

City of Richmond v. Bank of America, N.A., et

City of San Jose, et al. v. Bank of America, N.A., et al., No. 10-04991 Redevelopment Agency of the City and County of San Francisco v. Bank of America, N.A., et al., No. 10-4987

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs in the above-captioned actions and Defendants Trinity Plus Funding Capital Market Services, Inc., GE Funding Capital Market Services, Inc., Trinity Funding Co., LLC and General Electric Capital Corporation ("GE/Trinity") and subject to the approval of the Court, as follows:

- This stipulation supersedes the stipulation filed on February 28,
 2011 in Utah Housing Corporation v. CDR Financial Products, Inc. et al., No. 11-cv-1019;
- 2. No Defendant need answer or otherwise respond to the above-captioned Complaints until 30 days following a ruling by the MDL 1950 Court on the motions to dismiss currently pending in *State of West Virginia v. Bank of America, N.A., et al.*, No. 10-cv-769;
- Plaintiffs' opposition to any motion to dismiss the above-captioned
 Complaints filed by a Defendant shall not be due until thirty days after that date;
- 4. Defendants' replies in support of any motion to dismiss the abovecaptioned Complaints shall not be due until fifteen days after that date;
- 5. This extension is available to all named Defendants in these actions without further stipulation with counsel for Plaintiffs;

- 6. This stipulation shall not act to shorten the time for response of any party that would otherwise have a longer time to respond to the Complaint pursuant to the Federal Rules of Civil Procedure or any applicable local rules, and shall be without prejudice to any party's right to seek an additional extension of time to respond to the Complaint;
- 7. No defense of GE/Trinity or any other Defendant to this action is prejudiced or waived by its submission of this Stipulation;
- 8. No rights or claims of the above-captioned Plaintiffs or any other Plaintiff to an MDL 1950 action is prejudiced or waived by this Stipulation, including, but not limited to, any rights to file an amended complaint under any applicable federal or local rules; and
- 9. This Stipulation may be executed in separate counterparts, and counterparts may be executed in facsimile form, each of which shall be an original.

By: Jimothy Houpt Timothy C. Houpt

Corporation

Timothy C. Houpt
Billie J. Siddoway
JONES WALDO HOLBROOK &
McDONOUGH PC
170 South Main Street, Suite 1500
Salt Lake City, Utah 84101

Telephone: (801) 521-3200

Attorneys for Plaintiff Utah Housing

By Douglas L. Wald

John Arak Freedman Sonia Kuester Pfaffenroth Laura Cofer Taylor

ARNOLD & PORTER LLP 555 Twelfth Street NW

Washington, DC 20004 Telephone: (202) 942-5000

and

Craig A. Stewart ARNOLD & PORTER LLP 399 Park Avenue New York, NY 10022 Telephone: (212) 715-1000

Attorneys for Defendants Trinity Plus Funding Co., LLC and GE Funding Capital Market Services, Inc.

COTCHETT, PITRE & McCARTHY, LLP

840 Malcolm Road Suite 200

Burlingame, California 94010 Telephone: (650) 697-6000

Attorney for Plaintiffs Active Retirement Community, Inc. d/b/a Jefferson's Ferry, Peconic Landing at Southhold, Inc., Los Angeles Unified School District, Kendal on Hudson, Inc., Contra Costa County, the East Bay Municipal Utility District, the City of Los Angeles, Los Angeles World Airports, the City of Redwood City, the City of Richmond, the City of Riverside, the Redevelopment Agency of the City of Riverside, the Public Financing Authority of the City of Riverside, the Sacramento Municipal Utility District, the Sacramento Suburban Water District, the County of San Diego, the Redevelopment Agency of the City and County of San Francisco, the City of San Jose, the Redevelopment Agency of the City of San Jose, the County of San Mateo, the City of Stockton, the Redevelopment Agency of the City of Stockton, the Public Finance Authority of the City of Stockton, and the County of Tulare

So Ordered:

The Honorable Victor Marrero United States District Court Judge

Dated: 4 April 20//